



RQ-5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Steven M. Herzberg, Treasurer
Penn Mutual Political Action Committee
530 Walnut Street-Independence Square
Philadelphia, PA 19172

MAY 09 2003

Identification Number: C00142372

Reference: Year End Report (11/25/02-12/31/02)

Dear Mr. Herzberg:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments (to include statements, designations, and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Brandy Phillips
Campaign Finance Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use Schedule A (check only one of each category or list desired summary page)

 FORM LINE NUMBER : PAGE 5/8
 (check only one)

 11a 11b 11c 11d 12
 13 14 15 16 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

 NAME OF CONTRIBUTOR (In Full)
 The Penn Mutual Political Action Account

Full Name (Last, First, Middle Initial)

 A. John Abner _____ Date of Receipt _____
 Mailing Address _____ 03 31 2002
 2364 14th Road

City _____ State _____ Zip Code _____

City _____ PA Zip Code _____

FEC ID number of contributing federal political committee _____ 450.00

Name of Employer The Penn Mutual Life Insurance Co. Occupation EVP, Systems & Services

Receipt For: Aggregate Year-to-Date Y

 X Primary General
 Other (Specify) w 450.00

Contribution

Transaction ID: SA11A1.1B1

Full Name (Last, First, Middle Initial)

 B. Nancy Broth _____ Date of Receipt _____
 Mailing Address _____ 03 31 2002
 1338 Neumann Street

City _____ State _____ Zip Code _____

City _____ PA Zip Code _____

FEC ID number of contributing federal political committee _____ 600.00

Name of Employer The Penn Mutual Life Insurance Co. Occupation EVP, GPO

Receipt For: Aggregate Year-to-Date Y

 X Primary General
 Other (Specify) w 600.00

Contribution

Transaction ID: SA11A1.1B2

Full Name (Last, First, Middle Initial)

 C. Robert Chastain _____ Date of Receipt _____
 Mailing Address _____ 03 31 2002
 156 Slacksmith Road

City _____ State _____ Zip Code _____

City _____ PA Zip Code _____

FEC ID number of contributing federal political committee _____ 1475.64

Name of Employer The Penn Mutual Life Insurance Co. Occupation Chairman & CEO

Receipt For: Aggregate Year-to-Date Y

 X Primary General
 Other (Specify) w 1475.64

Contribution

Transaction ID: SA11A1.1C0

SUBTOTAL of Receipts This Page (top block) 2525.00

TOTAL This Period (last page this box must fit only) P

FEC Schedule A (Rev. 1-2001)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FORM LINE NUMBER: PAGE 5/8
 (check one and)

 118 119 120 121 122
 123 124 125 126 127

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 or for commercial purposes, other than using the name and address of any person contributing to valid contributions from such committee.

NAME OF COMMITTEE (if PBO)
THE PENN MUTUAL POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)		Date of Receipt
A. <u>John Abner</u> Mailing Address 3364 Mill Road City _____ Collegeville PA 19428		06 30 2002
FEC ID number of contributing Federal political committee.		Amount of Each Receipt this Period
		480.00
Name of Employer The Penn Mutual Life Insurance Co.	Occupation EVP, Systems & Services	Contribution
Receipt For Primary <input checked="" type="checkbox"/> General Other (Specify) <input type="checkbox"/>	Aggregate Year-to-Date <input type="checkbox"/>	
	900.00	Transaction ID: SA11A1.110
Full Name (Last, First, Middle Initial)		Date of Receipt
B. <u>Mark Brooks</u> Mailing Address 1536 Mountain Street City _____ Philadelphia PA 19146		06 30 2002
FEC ID number of contributing Federal political committee.		Amount of Each Receipt this Period
		600.00
Name of Employer The Penn Mutual Life Insurance Co.	Occupation SVP & CFO	Contribution
Receipt For Primary <input checked="" type="checkbox"/> General Other (Specify) <input type="checkbox"/>	Aggregate Year-to-Date <input type="checkbox"/>	
	1216.72	Transaction ID: SA11A1.115
Full Name (Last, First, Middle Initial)		Date of Receipt
C. <u>Robert Chappell</u> Mailing Address 100 Blacksmith Road City _____ Croy PA 19347		06 30 2002
FEC ID number of contributing Federal political committee.		Amount of Each Receipt this Period
		1475.04
Name of Employer The Penn Mutual Life Insurance Co.	Occupation Chairman & CEO	Contribution
Receipt For Primary <input checked="" type="checkbox"/> General Other (Specify) <input type="checkbox"/>	Aggregate Year-to-Date <input type="checkbox"/>	
	2651.26	Transaction ID: SA11A1.116
SUBTOTAL of Receipts this Page (optional)		2535.00
TOTAL this Period (last page use line number and)		*

FEC Form 3X (Revised 12/00)

SCHEDULE A (FEC Form 30)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 detailed Summary Page

 FOR LINE NUMBER: 1 PAGE 6 / 8
 (check entire row)

<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b	<input type="checkbox"/>	11c	<input type="checkbox"/>	12
<input type="checkbox"/>	13	<input type="checkbox"/>	14	<input type="checkbox"/>	15	<input type="checkbox"/>	16

 Any information copied from such Reports and Statements may not be sold or otherwise used for the purpose of soliciting contributions
 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from that committee.

 NAME OF COMMITTEE (if PAC)
 THE PENN MUTUAL POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)		Date of Receipt
A. Robert Chappell Mailing Address: 100 Blakemore Road City: PA Zip Code: 16612		09 30 2002
FEC ID number of contributing federal political committee.		Amount of Each Receipt/its Period 1,256.84
Name of Employee: The Penn Mutual Life Insurance Co.	Occupation: Chairman & CEO	Contribution
Receipt For:	Aggregate Year-to-Date *	
Primary Other (specify) *	4,028.92	Transaction ID: SA11A1.4270
Full Name (Last, First, Middle Initial)		Date of Receipt
B. Diane Rice Mailing Address: 2800 Summit Avenue City: PA Zip Code: 16001		09 30 2002
FEC ID number of contributing federal political committee.		Amount of Each Receipt/its Period 27.50
Name of Employee: The Penn Mutual Life Insurance Co.	Occupation: VP Sales Operations	Contribution
Receipt For:	Aggregate Year-to-Date *	
Primary Other (specify) *	252.50	Transaction ID: SA11A1.4274
Full Name (Last, First, Middle Initial)		Date of Receipt
C. Neisha Kobl Mailing Address: 304 Central Street City: NJ Zip Code: 08108		09 30 2002
FEC ID number of contributing federal political committee.		Amount of Each Receipt/its Period 82.74
Name of Employee: The Penn Mutual Life Insurance Co.	Occupation: Service Director	Contribution
Receipt For:	Aggregate Year-to-Date *	
Primary Other (specify) *	234.22	Transaction ID: SA11A1.4283
TOTAL of Receipts This Page (add all)		1,067.00
TOTAL This Period (see page one for number of pg.)		
FEC READER A. (Rev 02/1990)		

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedules
or each category of the
Detailed Summary Form

 FOR LINE NUMBER _____ PAGE 5/3
(check only one)

 11a 11b 11c 12
 13 14 15 16 17

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or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

NAME OF COMMITTEE (In Full)

THE PENN MUTUAL POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

A. Robert Clappak

Mailing Address

198 Blacksmith Road

City

State

Zip Code

City

PA

19547

Date of Receipt

10 15 2002

 FEC ID number of contributing
federal political committee

24554

 Name of Employer
The Penn Mutual Life Insurance Co.

Occupation

Chairman & CEO

Contribution

Receipt For:

 Aggregate Year-to-Date:

 Primary General
Other (Specify)

4072.58

Transaction ID: SA11A14812

Full Name (Last, First, Middle Initial)

B. James Clay

Mailing Address

2530 Summit Avenue

City

State

Zip Code

Birmingham

PA

15208

Date of Receipt

10 15 2002

 FEC ID number of contributing
federal political committee

16.25

 Name of Employer
The Penn Mutual Life Insurance Co.

Occupation

VP Sales Operations

Contribution

Receipt For:

 Aggregate Year-to-Date:

 Primary General
Other (Specify)

309.75

Transaction ID: SA11A14814

Full Name (Last, First, Middle Initial)

C. James Clay

Mailing Address

304 Center Street

City

State

Zip Code

Westfield

NJ

07090

Date of Receipt

10 15 2002

 FEC ID number of contributing
federal political committee

15.70

 Name of Employer
The Penn Mutual Life Insurance Co.

Occupation

Service Directory

Contribution

Receipt For:

 Aggregate Year-to-Date:

 Primary General
Other (Specify)

300.01

Transaction ID: SA11A14820

SUBTOTAL of Receipts This Page (Previous) * 277.00

TOTAL This Period (last page this file number only) ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedules
 for each category or the
 Detailed Summary Page

 FOR LINE NUMBER: 1 PAGE 6 OF 11
 (check only one)

 11a 11b 11c 12
 13 14 15 16 17

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NAME OF COMMITTEE (in FEE)
THE PENN MUTUAL POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

A. Nancy Bracco
 Mailing Address
 1500 Naudain Street
 City 39226 Zip Code 1115
 Philadelphia PA 19146

Date of Receipt

11 15 2002

Amount of Each Receipt This Period

203.12

 FEC ID Number of contributing
 Federal political committee

 Name of Employee
 The Penn Mutual Life Insurance Co.

 Occupation
 EVP & CFO

Contribution

Receipt For:

Aggregate Year-to-Date *

 Primary General
 Other (specify) *

2132.78

Transaction ID: SA11A1.4345

Full Name (Last, First, Middle Initial)

B. Robert Chiarulli
 Mailing Address
 155 Blacksmith Rose
 City State Zip Code
 Clif PA 19547

Date of Receipt

11 15 2002

Amount of Each Receipt This Period

491.69

 FEC ID number of contributing
 Federal political committee

 Name of Employee
 The Penn Mutual Life Insurance Co.

 Occupation
 Chairman & CEO

Contribution

Receipt For:

Aggregate Year-to-Date *

 Primary General
 Other (specify) *

5154.74

Transaction ID: SA11A1.4349

Full Name (Last, First, Middle Initial)

C. James Cary
 Mailing Address
 2830 Summit Avenue
 City State Zip Code
 Bronx PA 10306

Date of Receipt

11 15 2002

Amount of Each Receipt This Period

30.50

 FEC ID number of contributing
 Federal political committee

 Name of Employee
 The Penn Mutual Life Insurance Co.

 Occupation
 VP Sales Operations

Contribution

Receipt For:

Aggregate Year-to-Date *

 Primary General
 Other (specify) *

341.26

Transaction ID: SA11A1.4349

Subtotal of Receipts This Page (opposite) 727.50

TOTAL This Period (last page this form if there are any) 727.50

FEC Formatted A (Revised 1/2001)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or sheet(s) if any
 of the below summary page
 (check only one)

 FOR LINE NUMBER: PAGE 6 / 11
 (check only one)

 11A 11B 11C 12
 13 14 15 16 17

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 or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in FEE)

THE PENN MUTUAL POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

 A. Nancy Bracco
 Mailing Address
 1530 Nwadwin Street
 City PA Zip Code
 Philadelphia 19146

Date of Receipt

12 31 2002

Amount of Each Receipt this Period

304.00

 FEC ID Number of contributing
 federal political committee

 Name of Employer
 The Penn Mutual Life Insurance Co.

 Occupation
 EVP & CEO

Contribution

Receipt For:

Aggregate Year-to-Date Y

 Primary General
 Other (specify) □

2437.44

Transaction ID: SA11A1.4368

Full Name (Last, First, Middle Initial)

 B. Robert Grossell
 Mailing Address
 150 Blacksmith Road
 City PA Zip Code
 City PA Zip Code

Date of Receipt

12 31 2002

Amount of Each Receipt this Period

232.82

 FEC ID number of contributing
 federal political committee

 Name of Employer
 The Penn Mutual Life Insurance Co.

 Occupation
 Chairman & CEO

Contribution

Receipt For:

Aggregate Year-to-Date Y

 Primary General
 Other (specify) □

5602.58

Transaction ID: SA11A1.4408

Full Name (Last, First, Middle Initial)

 C. James Casy
 Mailing Address
 2620 Summit Avenue
 City PA Zip Code
 City PA Zip Code

Date of Receipt

12 31 2002

Amount of Each Receipt this Period

40.75

 FEC ID number of contributing
 federal political committee

 Name of Employer
 The Penn Mutual Life Insurance Co.

 Occupation
 VP Sales Operability

Contributions

Receipt For:

Aggregate Year-to-Date Y

 Primary General
 Other (specify) □

360.00

Transaction ID: SA11A1.4408

*SUBTOTAL of Receipts this Page (optional) 1031.25

TOTAL This Period (last page this line number only) *

23038074574